

**THE LAW OFFICES OF  
SALZMAN & WINER, LLP.**

305 BROADWAY, SUITE 1204  
NEW YORK, NY 10007

ALAN CHESTER SALZMAN  
HARVEY WINER  
hwiner@salzmanwiner.com

TEL: (212) 233-6550  
FAX: (212) 233-6714

MITCHELL G. SHAPIRO  
mshapiro@salzmanwiner.com

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**VIA ECF**

Justice Sandra L. Townes, U.S.D.J.  
United States District Court  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Brown v. Marriott International, Inc.  
Docket No.: 14 CV 5960 (SLT) (MDG)  
Handling Attorneys: Alan C. Salzman, Mitchell G. Shapiro and Harvey Winer

Dear Judge Townes:

We represent the plaintiff and hereby respond to defense letter dated 7/17/15 (Document 30). Defense is in essence inquiring when you intend to make a decision as to their 6/3/15 request (Document #23) for a pre-motion conference on their proposed motion to dismiss the complaint based both on failure to adequately plead in the amended complaint, and for forum non conveniens. Both sides have already fully submitted their arguments, pro and con, on the proposed application.

However, now with this 7/17/15 letter, which we deem inappropriate, defense attempts to submit additional information —claiming they have provided discovery recently that should bolster their forum non conveniens arguments. Without belaboring it, we do not concede this, our thoughts are just the opposite. The discovery they provided would not bear on whether the amended complaint was adequately pled.

Further Magistrate Go indicated that without a stay she expects discovery to proceed here in NY; her initial conference order filed 12/9/14 (document 6) directs that all “factual discovery” be completed by 9/30/15. Plaintiff has not been deposed yet although we have provided all the medical documentation defense requires, and not much time is left.

Very truly yours,  
SALZMAN & WINER, LLP.



Mitchell G. Shapiro, Esq.

MGS/mc

cc: Daniel M. Stewart  
WHITE FLEISCHNER & FINO, LLP.  
Attorneys for Defendant  
61 Broadway  
New York, NY 10006